INTERMEDIATE ENVIRONMENTAL MANAGEMENT (IEM)

Hazardous Waste Supervisor (HWS)

- Any First Line Supervisor of HWH
- May Perform Duties of the HWH
- May Temporarily Serve as the HWC with Special Approval
 - May Conduct Monthly HM Site Inspections
 - May Conduct Weekly HW Site Inspections for the HWC

Environmental Laws and Regulations



ACTIVITY POLICIES

INSTALLATION POLICIES

CITY OR COUNTY

STATE LAWS AND REGULATIONS

FEDERAL LAWS AND REGULATIONS

The Key Regulations

- Resource Conservation & Recovery Act (RCRA)
- Virginia Hazardous Waste Management Regulations
- Virginia Solid Waste Management Regulations
- Federal Facilities Compliance Act
- Occupational Safety and Health Administration
- Department of Transportation

What's the Difference?

Hazardous Material

 Any <u>Serviceable</u> Material or Product Which Has a Chemical, Physical, or Health Hazard.

Hazardous Waste

 A <u>Discarded</u> Product That Could Cause Injury or Death; Damage or Pollute the Air, Land, Water.















Hazardous Waste - What is it?

- Material That Is No Longer Usable
- Solid Waste
- Appears on Any One of Four EPA Lists of HW
 OR
- Exhibits General Hazardous Characteristics

Listed vs. Characteristic Wastes

- Listed Waste
 - Unused/Pure Products
 - "P" Listed (Acutely HW) and "U" Listed (Toxic HW)
 - Used / Spent Products
 - "F" Listed and "K" Listed
- Characteristic Waste
 - Ignitable
 - Corrosive
 - Reactive
 - Toxic

Keep in Mind

- Highly Regulated
- Planning: Plan Ahead
- Paperwork / Record Keeping
 - - **Operation** Document



Accumulation Site Management

■ Temporary Storage Sites (TSSs)

Satellite Accumulation Sites (SASs)

All Site Actions - Must Be Approved



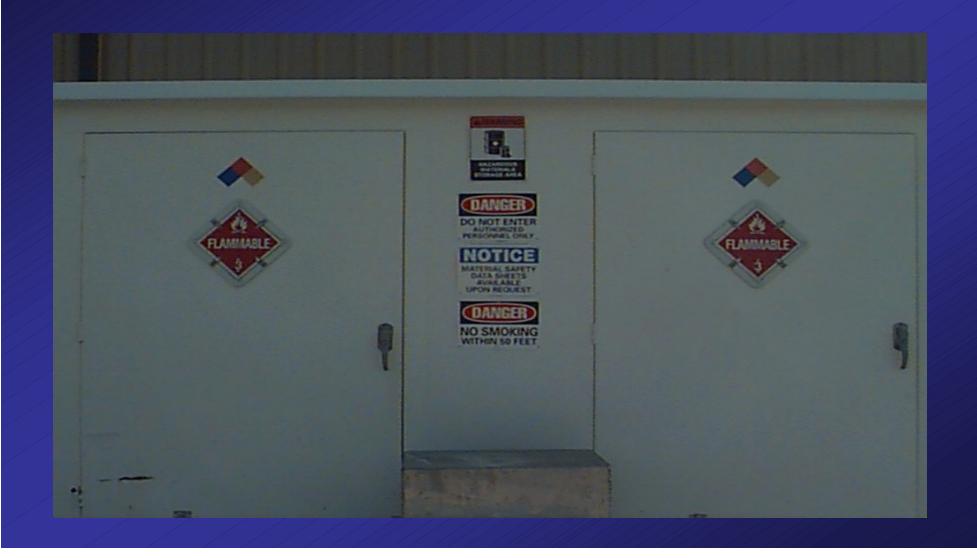
TSSs - Temporary Storage Sites

- Located at Distance From Generation Point
- Receives Wastes From Multiple Sites
- Any Quantity of Wastes
- Accumulation Start Date (ASD) First Drop in Container
- Must Be Turned-in to HWAF Within 14 Days

SASs - Satellite Accumulation Sites

- Wastes From, At, or Near the Point of Generation (Only One Generator)
- Quantity Limitation
- ASD Applied When Container Is Full & Ready for Turn-in
- Must Be Turned-in to a TSS or HWAF Within 3 Days After the ASD Is Annotated

Storage Sites



Storage Site Inspections

- Each HW Site Inspected at Least Weekly
 - TCFE Form 6036, Weekly HW Accumulation Site Inspection
- Check For:
 - Quantities Do Not Exceed Storage Limits
 - Containers Are in Good Condition and Properly Labeled
 - Serviceable Fire Extinguisher, Spill Kits

WEEKLY HW ACCUMULATION SITE INSPECTION

Generating Activity:	Authorized Site No.	TSS		SAS		HWAF		
 Does area have signs indicating the type of HW storage? Does area have "No Smoking" signs? Does area have "Unauthorized Personnel Keep Out" signs? . Does area have sign for Emergency Notification Instructions? Does site have copy of Contingency Plan (CP) posted? Does site have adequate aisle space? Is communication equipment (telephone, radio, etc) available and operational? Are fire extinguishers available? Charged? Seals intact? Is spill kit available and serviceable? Are drums available for overpacking leaking containers or spills? Are wastes stored with adequate containment? Sheltered from environment? Are the containers DOT approved? Are the containers serviceable? (Free of dents, rust, leaks, etc.) Are bungs/rings secured? Are containers tightly closed? 		16. Is the AUL present? Are MSDSs present for all waste streams? 17. Are containers properly labeled as required? (HW, NHW, DOT, Empty, etc) 18. Are the containers compatible with the stored materials? 19. Are wastes separated from serviceable materials? 20. Are incompatable wastes separated from other wastes? 21. Does container have unique container number? 22. Is correct generator or shipper address present? 23. Is DOT proper shipping name on HW labels? 24. Is DOT UN or NA number correct for HW labels? 25. Are EPA waste codes correct for HW labels? 26. Is accumulation start date on HW labels as required? 27. Is Emergency Eye Wash & Shower Operable? Flushed Monthly? 28. Is PPE (goggles, gloves, boots, respirators, etc.) available/serviceable? 29. Is the area secured when not in use?						
15. Is a Container Contents Log present & complete for each container?		30. Are any containers stored longer than 70 days at the HWAF? CORRECTIVE ACTIONS & DATE						
DATE TIME NAME OF INSPECTO	OBSERVATIONS			COF	KREC	TIVE ACTIONS	& DAT	E
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Container Storage

- All HW and NHW Must Be Stored in a TSS or SAS
- Do Not Store Containers of Used Oil or other Recyclable Materials in a TSS or SAS
- All Containers Must Be Properly Labeled
- Containers Will Be Stored So Labels Are Readable Without Moving the Container
- Containers Will Be Closed Except for Adding or Removing Materials

Proper Labels

HAZARDOUS WASTE FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY. GENERATOR INFORMATION: NAME U.S. ARMY TRANSPORTATION CENTER (FORT EUSTIS) ADDRESS ATTN: ATZF-PWE, BLDG 1407 PHONE 757-878-3915 CITY FORT EUSTIS STATE VA ZIP 23604-5332 EPA MANIFEST DOCUMENT NO. VA8213720321 ACCUMULATION START DATE WASTE NO. D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PRIEFIX HANDLE WITH CARE! STYLE WAMP

U.S. Army Transportation Center Environmental and Natural Resources Division Fort Eustis, Virginia The contents of this container are awaiting analysis. Container Number: Contents: Date Generated: Date Analyzed: Generating Activity: POC: Phone: Additional Information:

NON ROOUS NASTE

WASTE EXCLUDED REGULATION UNDER R 261.4 (b) GENERATOR INFORMATION: (optional)

U.S. ARMY TRANSPORTATION CENTER
SHIPPER (FORT EUSTIS)

ADDRESS ATTN: ATZF-PWE, BLDG 1407

CITY, STATE, ZIP FORT EUSTIS, VA 23604-5332

CONTENTS:

N-HAZARDOUS WASTE

EPA ID. NO. VA8213720321

GWMVP-SPEC REV.11-1-92 LABELINASTER® (800) 621-5808 www.labelmaster.com

Accumulation Start Date (ASD)

- Specific Time When Container Must Be Dated
- Time Limits Different for Various Site Types.
 - TSS 14 Days From the First Drop
 - SAS 3 Days Once the Container Is Full; or One Year

Container Contents Log (CCL)

- TCFE Form 645
- An Inventory of Wastes As They Accumulate
 - The Contents on the Container Label Must Match the Description on the CCL
 - The CCL Container Number must Match the Container
- Every Time Waste Is Added to the Container It Must Be Recorded on the CCL

2. Profile No: 3. HWAF Doc. Reg. No: 1. Container Number: 5. Building Number: 4. Generating Activity: 7. Phone Number of HWC: 6. Authorized Site Number: 8. DOT Proper Shipping Name: 10. DOT ID Number: 11. Packaging Group: 9. DOT Hazard Class: 13. Size or Volume: 12. DOT Container Type: EPA REQUIRED INFO: 14. Waste Decription: 15. ASD: 16. EPA Waste Codes: 17. Origin Code: 18. Source Code: 19. Form Code: 21. Type of Waste 23. Name of Person ESTIMATED QUANTITY 20. Date of (DESCRIPTION OF CONTENTS) 22. Process Generating Waste Adding Waste 24. Pounds 25. Gallons Activity

CONTAINER CONTENTS LOG

Sheet of

I certify that the contents of this container have been fully and accurately described above and listed IAW all applicable federal, state, and local rules and regulations.

30. Name of HWC:

Date:

31. Name of AEC: Signature: Date:

Form 645 Mar 99

26. Comments:

27. Subtotal of Additional Sheets

29. ACTUAL WEIGHT BY HWAF:

28. Container Total

Safety

- Check the CCL Before Adding Any Waste
 - You May Get Dangerous Results
 - May Cost More Money
 - Lab Analysis
 - Disposal
 - Fines

In the Event of an Emergency Call 911

QUESTIONS?